

# Exhibit A

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

A.S.R., on his own behalf and on behalf of others  
similarly situated,

Petitioner,

v.

DONALD J. TRUMP, *et al.*,

Respondents.

Case No. 3:25-cv-00113 (SLH)

**SUPPLEMENTAL DECLARATION OF DEPUTY FIELD OFFICE DIRECTOR DAVID  
O'NEILL**

I, David O'Neill, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an adult over the age of 18 and competent to give this declaration.
2. I am currently employed by the U.S. Department of Homeland Security (DHS), Enforcement and Removal Operations (ERO). I have worked for the ERO Philadelphia Field Office since August of 1996. I currently hold the position of Deputy Field Office Director (DFOD) and have held this position since May 2020.
3. As DFOD, my duties include oversight over ERO Philadelphia's detained docket and general custody management.
4. As the DFOD, I am responsible for, among other things, oversight of the detention of aliens in the Philadelphia area of responsibility, including the Moshannon Valley Processing Center (MVPC) in Phillipsburg, Pennsylvania, and have access to records maintained in the ordinary course of business by ICE, including documentary records concerning the Philadelphia ERO Field Office and the alien detainees who fall within the responsibility of that field office.

5. The following information is based on my personal knowledge and my review of information obtained from other individuals employed by DHS, information obtained from government records and databases maintained by DHS.

**Venezuelan Detainees Subject to the Alien Enemies Act Proclamation**

6. As of June 3, 2025, there are no aliens detained by ICE in the Western District of Pennsylvania who have been designated under the Alien Enemies Act Proclamation.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of June 2025, Philadelphia, Pennsylvania.



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David O'Neill  
Deputy Field Office Director